



**DEPARTMENT OF THE ARMY**  
**US ARMY INSTALLATION MANAGEMENT COMMAND**  
**HEADQUARTERS, UNITED STATES ARMY GARRISON DAEGU**  
**UNIT #15746**  
**APO AP 96218-5746**

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2015 .07. 27

**MEMORANDUM FOR SEE DISTRIBUTION**

**SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program**

1. The proponent for this policy is the Directorate of Public Works.
2. This policy is effective immediately. It remains in effect until rescinded/superseded.
3. References.
  - a. AR 200-1, Environmental Protection and Enhancement, 13 Dec 07, effective date 23 Dec 07.
  - b. US Forces Korea (USFK) Regulation 201-1, Environmental Governing Standards, 18 Jun 12.
  - c. Technical Manual (TM) 38-410, Storage and Handling of Hazardous Materials, 13 Jan 99.
4. Applicability. This policy applies to:
  - a. All USAG Daegu Headquarters directorates and organizations, all installation support activities, tenant units, and organizations within USAG Daegu and Area IV.
  - b. All permanently or temporarily assigned active duty military and reserve components at USAG Daegu and Area IV.
  - c. All appropriated and non-appropriated funded US and Local National activities permanently or temporarily tenant on USAG Daegu and Area IV.
  - d. All Army and Air Force Exchange Service (AAFES) and all Defense Commissary Agency (DECA) activities permanently or temporarily tenant on USAG Daegu and Area IV.

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

5. Purpose. To establish a standardized internal USAG Daegu environmental inspection and assessment program that assures compliance with Department of Defense, US Army, and USFK environmental rules, regulations, standards, and directives.

6. Responsibilities.

a. Directorate of Public Works (DPW), Environmental Division will:

(1) Conduct environmental compliance inspections to include, Internal Environmental Performance Assessment System (EPAS) assessments annually, and coordinate external EPAS assessments of facilities within USAG Daegu every three years. An EPAS assessment includes an assessment of the EMS's conformance to ISO 14001, Army EMS policy, and the USAG Daegu EMS procedures.

(2) Prepare Corrective Action Plan (CAP) of the findings noted during the internal and external EPAS assessments. The Corrective Action Plan will identify the root cause of each non-conformance. A single CAP will include corrective actions for Compliance and EMS findings. USAG Daegu will use the Corrective Action Plan to track closure status of all findings.

(3) Provide assistance and technical expertise in correcting deficiencies observed during all other inspections and assessments.

(4) Prepare a Report of Findings of all inspections and assessments conducted by the DPW Environmental Division. The Report of Findings will be coordinated with Unit Environmental Office/POC to ensure effective measures will be implemented.

(5) Conduct quarterly Environmental Officers training, Hazardous Materials/Hazardous Waste training (English and Korean) and refresher training.

b. Unit Commanders and Organization Supervisors will:

(1) Appoint in writing a primary and alternate unit or organizational Environmental Officer (EO) and ensure they attend and successfully complete the EO certification course within three (3) months following appointment.

(2) Implement this policy and correct identified negative findings within ten (10) working days.

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

(3) Provide an EO to accompany all environmental inspectors and assessors during environmental audits.

(4) Ensure the DPW Environmental Division is notified of anyone entering any unit or organizational facility to conduct an environmental audit or survey.

(5) Communicate environmental ethics to assigned personnel while training them to be good environmental stewards.

(6) Develop and sustain a positive and proactive commitment to environmental protection.

(7) Protect the environment during training and other operations.

(8) Train peers and subordinates to identify the environmental impacts of plans, actions, and missions.

(9) Counsel personnel on the importance of protecting the environment and the consequences of noncompliance.

c. Unit and Organizational EOs Will;

(1) Ensure compliance with Environmental requirements in Korea and conform to Garrison Environmental Management System (EMS) policies and procedures including Pollution Prevention, Recycling, Energy conservation, and Natural Resource Protection.

(2) Ensure proper management of hazardous materials, hazardous waste, and follow proper Standard Operating Procedures (SOP).

(3) Ensure any changes in policy, procedures and environmental information are disseminated to all levels within the organization.

(4) Ensure training for all unit personnel regarding installation environmental programs, policies and procedures, as well as any unit level procedures necessary to comply with installation policies.

(5) Organizations will maintain:

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

(a) An electronic or hard copy of the USAG Daegu Spill Prevention and Response Plan and applicable Material Safety Data Sheets (MSDSs) or Safety Data Sheets (SDSs), Best Management Practices and SOPs.

(b) Record of all Hazardous Material releases and spills per the USAG Daegu Spill Prevention and Response Plan.

(c) Training records of unit personnel.

(d) Proof of current EO certification (i.e., appointment and EO Course completion certificate).

(e) Environmental Standard Operating Procedures (SOP).

(f) Inspection records (internal records as well as inspections from DPW Environmental Division).

(g) Hazardous material inventory.

(h) MSDS or SDS for all hazardous material stored and used within the facility.

(i) Develop and maintain a list of environmental monitoring equipment that require calibration and maintenance. Ensure specific personnel are assigned responsibility for maintaining calibration and maintenance of all items on the list.

(6) Ensure required documentation is maintained.

(7) Ensure adherence to installation requirements for training or operations in the field.

(8) Ensure periodic environmental inspections are conducted as required.

(9) Inform the commander, director or supervisor of any environmental problems, issues, potential violations, or legalities.

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

(10) Serve as a Cross-functional Team (CFT) member and attend special meetings or training sessions that may be coordinated during the year by DPW, Environmental Division.

(11) Implement improvements Pollution Prevention (P2) Initiatives.

## 7. Inspections, Intervals, and Requirements.

### a. Hazardous Waste Accumulation Point (HWAP) Inspections.

(1) The unit or organization EO, Alternate EO, or assigned HWAP Manager will conduct the weekly HWAP inspections using the Inspection Checklist at enclosure one (1) of this policy. No other checklist is authorized for use.

(2) The unit or organization will maintain completed HWAP Weekly Inspection Checklists for a minimum of three (3) years on site. Current year's checklists will be maintained at the HWAP (or designated location) protected from the weather. The previous years' checklists will be kept on file and be readily accessible to the unit's or organization's EO and Alternate EO.

(3) The unit and organization EO will make recommendations to the commander for corrective actions of negative findings. Submit maintenance service orders or work orders to DPW for the correction of facility deficiencies.

### b. Unit and Shop Level Environmental Compliance Inspections.

(1) Unit or organizational EO or Alternate EO will conduct monthly compliance inspections using the Environmental Compliance Inspection Checklist. Findings from any environmental compliance audit conducted within the facility by others who use the checklist can be used as the company's or organizational Monthly Environmental Compliance Inspection for the month the inspection occurred. The EO is not required to conduct an additional compliance inspection in that month. However, the EO must comply with all other provisions of this policy. Checklists can be obtained by contacting the DPW Environmental Office.

(2) Completed monthly environmental compliance inspection checklists will be kept and maintained on site for a minimum of three (3) years. Current year's monthly environmental compliance inspection checklists will be maintained in an active file and the previous three years' checklist in an inactive file. If the current year's inspection

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

checklists are not maintained in the Unit Continuity Book, a notation will be made in the continuity book as to the exact on-site location of the completed checklists.

(3) The unit or organization EO will seek support of the chain-of-command and the DPW Environmental Division as needed to correct deficiencies.

c. DPW Environmental Division Compliance Inspections and Assessments.

(1) Quarterly Environmental Compliance Inspections.

(a) DPW Environmental Division personnel will conduct quarterly environmental compliance inspections using the USAG Daegu Environmental Compliance Inspection Checklist.

(b) A written Inspection Report will be provided to the commander of the inspected unit or organization within ten work days after completion of the inspection. The Inspection Report will consist of a copy of the Inspection Checklist and Unit Corrective Action Plan (UCAP) (if applicable).

(c) The completed Quarterly Environmental Compliance Inspection Checklists and Inspection Reports will be kept by the unit or organization and maintained for a minimum of three (3) years.

(d) The unit or organization inspected by the Environmental Division is responsible for correcting all deficiencies. The EO will submit a UCAP to the DPW Environmental Division within ten working days after receipt of inspection results and findings. UCAPs are maintained as part of the inspection record for three (3) years. The UCAP will include the following:

1. Description of the finding(s).
2. Description of how the finding(s) is/are being corrected (who, what, when, where, how).
3. Estimated date that the finding(s) will be corrected.
4. Engineer work order numbers or service order numbers as appropriate.

(2) Follow-up of findings.

(a) Follow-ups on corrective actions will be conducted within 30 days, but not sooner than ten working days, after the initial quarterly inspection by DPW Environmental Division personnel.

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

(b) Other follow-ups may be performed as deemed necessary by the Environmental Division to assure unit or organizational compliance. If additional follow-ups are warranted, a written inspection report will be provided to the next higher level Commander.

(c) Follow-ups will be conducted using the UCAP to verify compliance.

(d) Closed UCAPs will become a part of the unit or organization environmental inspection record and maintained in the appropriate active and archived files.

(e) The USAG Daegu Commander will be notified of recurring noncompliance of any unit or organization.

(3) No-Notice Inspections.

(a) Environmental Division personnel will submit engineering service orders or work orders to DPW for those deficiencies noted in the spot checks that are beyond unit or organizational personnel's capabilities to correct. If a service or work order was previously submitted by the unit or organization, the Environmental Division employee will make note of the service or work order, check with DPW of status, and report status update information to the unit or organization EO.

8. Inspection Standards.

a. Hazardous Waste Accumulation Point Inspections. All elements listed in the Hazardous Waste Accumulation Point Weekly Inspection Checklist must be answered "yes" to be classified as "compliant". All deficiencies noted will be immediately corrected.

b. Environmental Compliance Inspections. Each inspection element listed in the Inspection Checklist will be rated based on the following rating scheme:

RATING KEY

C Compliant: Sufficient programs and activities completely in place to fulfill the intent of the inspection item.

NC Noncompliant: Programs and activities are not fully in place to support the inspection item; partial completion will be rated as "NC"

N/A Inspection item "Not Applicable" at the facility being inspected.

IMDA-ZA

SUBJECT: US Army Garrison (USAG) Daegu Policy Letter#62, Environmental Compliance Inspection Program

c. Inspection Results. More than three (3) NCs in a single section will result an unsatisfactory rating for that section. The final overall inspection rating is based on section results. Any section rating of unsatisfactory will result in an overall inspection result of unsatisfactory. Inspection items marked N/A are "Not Applicable" in that particular facility and will not be rated against the facility being inspected.

9. Site Assistance Visits (SAVs). DPW Environmental Division personnel will conduct site assistance visits to any unit or organization upon request. Site assistance visits are a resource tool to aid unit and organization EO's in achieving a positive compliance posture. Site assistance visits are not environmental compliance inspections and cannot be used in lieu of the weekly, monthly, or quarterly compliance inspection requirements of this policy.

10. Point of contact for this policy is the Chief, DPW Environmental Division, 764-4146.

Encl



K TED STEPHENS  
COL, AR  
Commanding

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